

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Statesville Division

CROWN EQUIPMENT CORPORATION,)	
)	
Plaintiff,)	
)	Case No. 5:23-cv-00059-KDB-DCK
v.)	
)	
DAVID BRADY, <i>et al.</i> ,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND TIME TO ANSWER FOR DEFENDANTS

Plaintiff Crown Equipment Corporation (“Plaintiff”) and Defendants David Brady, William Tucker, Brawtus Holding Company, Inc., and Brawtus Management Company, LLC (“Defendants”) (jointly referred to as the “Parties”), by counsel, hereby move to extend the deadline for all defendants to respond to Plaintiff’s Complaint until August 21, 2023.

Defendants have good cause for requesting an extension to respond to Plaintiff’s Complaint. First, Plaintiff’s Complaint is 210 pages long and contains a bevy of legally and factually complex claims. Second, Plaintiffs conducted in-person service on Defendants at various dates between June 16, 2023, and June 21, 2023; however, Defendants’ attorneys were not made aware that service had been performed until June 28, 2023. To give all defendants sufficient time to provide an adequate response and streamline the process of filing answers, the parties move to establish August 21, 2023, as defendants’ deadline to answer.

Dated: July 6, 2023

Respectfully submitted,
BY COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served the foregoing on the following counsel of record who are CM/ECF participants:

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